

Omid A. Mantashi (SBN 208226)
Attorney at Law
360 Grand Ave., Ste. 90
Oakland, CA 94610
(510) 593-9442 (Voice)
(510) 868-8310 (Fax)
omid@ipfoundry.com

Attorney for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

FITNESS ANYWHERE, INC.,

Plaintiff,

vs.

STANLEY YAN, *et al.*

Defendants.

Case No.: CV 09-04815 RS

STIPULATION AND
~~[PROPOSED]~~ ORDER OF DISMISSAL
OF DEFENDANT TIMOTHY SANTOS

Hon. Richard Seeborg

1 WHEREAS Plaintiff Fitness Anywhere, Inc., and Defendant Stan Chin,
2 individually and doing business as PrimoFitness, have executed a settlement
3 agreement resolving all claims in this action, and are currently performing the terms
4 and conditions thereof;

5 NOW THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiff
6 Fitness Anywhere, Inc., and Defendant Stan Chin, individually and doing business as
7 Primo Fitness, by and through their respective undersigned counsel of record, subject
8 to the Court's approval and order thereon, that:

- 9 1. Each of the undersigned parties' claims against the other are dismissed with
10 prejudice; and,
11 2. Each undersigned party shall bear its own costs and attorneys' fees.

12 IT IS SO STIPULATED.

13 Respectfully submitted,

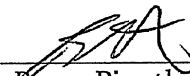
14 For Plaintiff FITNESS ANYWHERE,
15 INC.

16 

17 Omid A. Mantashi
18 ATTORNEY AT LAW

19 12/19/2011
20 Date

For Defendant STAN CHIN

21 

22 Bruce Piontkowski
23 TINGLEY PIONTKOWSKI LLP

24 12/19/11
25 Date

26 IT IS SO ORDERED.

27 Dated: December 20, 2011, by:

28 

Hon. Richard Seeborg
United States District Court Judge
Northern District of California

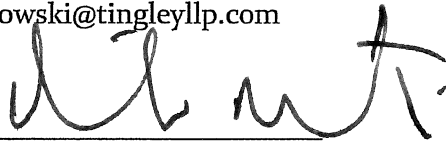
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CERTIFICATE OF SERVICE

It is hereby certified that on the 19th day of December, 2011, the foregoing
STIPULATION AND [PROPOSED] ORDER OF DISMISSAL OF DEFENDANT STAN
CHIN was filed and served on the following through the Northern District of
California ECF system:

Defendant Paul Fu: Jingming James Cai
 Schein & Cai LLP
 111 W St. John Street, Ste. 1250
 San Jose, CA 95113
 jcai@sacattorneys.com

Defendant Stan Chin: Bruce Piontkowski
 Tingley Piontkowski LLP
 10 Almaden Boulevard, Ste. 430
 San Jose, CA 95113
 bpiontkowski@tingleyllp.com



Omid A. Mantashi
Attorney for Plaintiff
FITNESS ANYWHERE